

**Southern Illinois RSA Partnership
d/b/a First Cellular of Southern Illinois
King City Square
417 South 42nd Street
Mt. Vernon, Illinois 62864**

Via ECFS Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 – 12th Street, S.W.
Washington, D.C. 20554

Attn: John B. Muleta, Chief, Wireless Telecommunications Bureau
David H. Solomon, Chief, Enforcement Bureau

**Re: CC Docket No. 94-102
Cellular Radiotelephone Service Station KNKN506,
CMA Market No. 401(B), Illinois 8 - Washington RSA; and
Cellular Radiotelephone Service Station KNKN820,
CMA Market No. 402(B), Illinois 9 – Clay RSA.**

Amended E-911 Interim Report

Dear Ms. Dortch:

The Filer, Southern Illinois RSA Partnership d/b/a First Cellular of Southern Illinois, hereby amends its “E-911 Interim Report,” filed July 30, 2003, to report that it has now received a Public Safety Answering Point (“PSAP”) request for Phase II E-911 service from the PSAP for Franklin County, Illinois. The request is set forth in a PSAP letter dated August 5, 2003.

The July 30, 2003 “E-911 Interim Report” was submitted pursuant to the requirements of the Commission’s Order to Stay (CC Docket No. 94-102), FCC 02-210, released July 26, 2002 (“Stay Order”) and the Commission’s Public Notice, entitled “Wireless Telecommunications Bureau Provides Further Guidance on Interim Report Filings by Small Sized Carriers,” Mimeo DA 03-2113, released June 30, 2003.

The Filer is a Tier III non-nationwide Commercial Mobile Radio Service carrier. The Filer was not granted relief in the Stay Order, but has pending before the Commission a request for similar relief. The information is presented in the format specified by the Commission, as follows:

A) The Number Of Phase I And Phase II Requests From PSAPs (including those the carrier may consider invalid): The Public Safety Answering Points (“PSAPs”) in the Filer’s twenty-four county service area are identified as follows: 1) Alexander County, Illinois – Illinois State Police at Ullin, Illinois; 2) Clay County,

Illinois – Illinois State Police at Effingham, Illinois; 3) Edwards County, Illinois – Illinois State Police at Carmi, Illinois; 4) Franklin County, Illinois – Franklin County Emergency Telephone System Board, which oversees E-911 operations at the Franklin County Sheriff Department, the West Frankfort Police Department and Christopher Central Dispatch; 5) Gallatin County, Illinois – Saline County Sheriff Department; 6) Hamilton County, Illinois – Illinois State Police at Carmi, Illinois; 7) Hardin County, Illinois – Illinois State Police at Ullin, Illinois; 8) Jackson County, Illinois – Jackson County Sheriff Department; 9) Jefferson County, Illinois – Jefferson County Sheriff Department; 10) Johnson County, Illinois – Johnson County Sheriff Department; 11) Lawrence County, Illinois – Crawford County Sheriff Department; 12) Massac County, Illinois – Massac County Sheriff Department; 13) Perry County, Illinois – Perry County Sheriff Department; 14) Pope County, Illinois – Illinois State Police at Ullin, Illinois; 15) Pulaski County, Illinois – Pulaski County Sheriff Department; 16) Randolph County, Illinois – Randolph County Sheriff Department; 17) Richland County, Illinois – Richland County Sheriff Department; 18) Saline County, Illinois – Saline County Sheriff Department; 19) Union County, Illinois – Union County Sheriff Department; 20) Wabash County, Illinois – Illinois State Police at Carmi, Illinois; 21) Washington County, Illinois – Washington County Sheriff Department; 22) Wayne County, Illinois – Illinois State Police at Carmi, Illinois; 23) White County, Illinois – Illinois State Police at Carmi, Illinois; and 24) Williamson County, Illinois – Williamson County Sheriff Department.

The Filer has deployed Phase I E-911 equipment throughout its twenty-four county service area. The Filer has received requests for Phase I E-911 service from the PSAPs for the following counties:

<u>County</u>	<u>Request Date</u>	<u>Phase I In-Service Date</u>
Franklin	July 31, 2000	May 21, 2002
Gallatin	October 18, 2000	May 24, 2002
Jackson	August 1, 2000	May 1, 2002
Jefferson	June 12, 2000	January 29, 2003
Massac	May 17, 2001	Pending
Perry	January 23, 2001	May 2, 2002
Pulaski	July 18, 2000	April 26, 2003
Randolph	August 3, 2000	April 18, 2002
Richland	April 16, 2001	May 23, 2002
Saline	August 10, 2000	May 24, 2002
Union	June 13, 2000	April 26, 2002
Washington	April 16, 2001	June 5, 2002
Williamson	December 18, 2000	April 18, 2002

Consistent with Commission policy, the in-service dates shown above were negotiated with the requesting PSAPs. The Phase I request from the Massac County PSAP remains pending because the PSAP is not ready to process the Phase I data elements. The State of Illinois has in place a PSAP funding mechanism for Phase I E-911 service.

The Filer has received five PSAP requests for Phase II E-911 service, i.e., from the PSAPs for Randolph, Saline, Gallatin, Williamson, Jefferson and Franklin Counties. The Filer considers all five PSAP requests invalid because, to date, the State of Illinois does not have in place a PSAP funding mechanism for Phase II E-911 service. In addition, the Filer further considers the request from the Randolph County PSAP invalid because that PSAP specifically has advised that it is not capable of receiving and processing the Phase II E-911 Automatic Location Information (“ALI”) data elements. Furthermore, the Filer additionally questions whether the Jefferson County PSAP’s request is valid and whether it will remain operative for other reasons. This is because the Jefferson County PSAP’s written request appears to suggest that the PSAP is under the mistaken assumption that the Filer is required to bear the PSAP’s implementation costs and to design the PSAP’s E-911 Phase II technical solution. As the Commission is aware, no Commission Rule imposes such duties on the Filer.

B) The Carrier’s Specific Technology Choice (i.e., network-based or handset-based solution, as well as the type of technology used): The Filer’s cellular systems currently provide both analog and Code Division Multiple Access (“CDMA”) digital transmission capacity; and employ cellular base station and switching equipment manufactured by Motorola, Inc. (“Motorola”). In addition, the Filer intends to also install Global System for Mobile Communication (“GSM”) digital transmission capacity. The Filer intends to deploy a network-based Phase II E-911 ALI solution.

Under the Filer’s initial Phase II E-911 deployment plan, the Filer intended to install the necessary Phase II E-911 equipment and software throughout its twenty-four county service area without regard to whether it had received any PSAP requests for Phase II service from all of the affected PSAPs. A simultaneous, system wide deployment was viewed as the most cost-effective way over time to proceed and as providing a better integrated E-911 Phase II network. Under the original plan, the Phase II equipment and software was to be deployed and operational by June 30, 2003.

To achieve this goal, the Filer selected TruePosition as its Phase II E-911 equipment and software vendor of choice based upon its representations that its equipment was compatible with the Filer’s Motorola cellular system equipment. TruePosition provided the Filer with a contract for the purchase and installation of the necessary equipment and software on a turn-key basis throughout the Filer’s twenty-four county service area for a total price of \$1.2 Million. On February 24, 2003, the Filer signed the contract and returned it to TruePosition. However, to date, the Filer has not been provided with a copy of the contract executed by TruePosition (if, indeed, TruePosition ever signed the contract at all), even though TruePosition assured the Filer in mid-April of 2003 that the signed contract would be returned within “a few weeks.”

On or around May 1, 2003, True Position advised the Filer that the TruePosition Phase II E-911 ALI equipment and software is not compatible with the Filer’s Motorola cellular system equipment, notwithstanding its prior representations to the contrary which it had made to the Filer prior to the Filer’s execution of the TruePosition-provided

contract. This led to consultations between Motorola and TruePosition to determine whether a technical solution to the compatibility problem can be devised.

By letter dated June 27, 2003, Motorola advised the Filer that it had tested and certified a TruePosition network-based Phase II E-911 ALI solution between August 20, 2001 and September 13, 2001. However, it appears that TruePosition decided against commercializing the solution which was the subject of those tests, and instead elected to redesign the product. The resulting redesigned product is not compatible with the Motorola equipment. Motorola is continuing to evaluate the matter. It should also be noted that TruePosition has refused to provide the Filer with the Phase II ALI solution which was the subject matter of the August 20 – September 13, 2001 tests with Motorola.

The Filer has also brought Grayson Enterprises (the other major network-based solution vendor) back into the process to see if a solution can be devised with Motorola.

Additional details regarding the problems encountered are set forth in the status update letters which the Filer is sending to the Randolph, Saline, Williamson and Jefferson County PSAPs. A copy of one of the letters is appended hereto as Attachment A.

Thus, as the Commission can plainly see, the Filer is (and has been) ready, willing and able to install network-based Phase II E-911 ALI equipment and software, but has been frustrated from doing so by a lack of compatible equipment.

C) Status Of Ordering And/Or Installing Necessary Network Equipment:
See the response to Item B, above.

D) If The Carrier Is Pursuing A Handset-Based Solution, Include Information On Whether ALI-Capable Handsets Are Now Available, And Whether the Carrier has Obtained ALI-Capable Handsets Or Has Agreements In Place To Obtain These Handsets: This area of inquiry is not applicable because the Filer is not currently pursuing a handset-based Phase II E-911 ALI solution.

E) The Estimated Date On Which Phase II Service Will First Be Available In The Carrier's Network: Due to equipment compatibility issues, the Filer is unable to estimate the date on which Phase II service will first be available in the Filer's service area.

F) Information On Whether The Carrier Is On Schedule To Meet The Ultimate Implementation Date Of December 31, 2005: This area of inquiry is not applicable because the Filer is not currently pursuing a handset-based Phase II E-911 ALI solution.

Very truly yours,

**Southern Illinois RSA Partnership
d/b/a First Cellular of Southern
Illinois**

Dated: ✓ 8-18-03

By: ✓ [Signature]
Mike Jaksich
Vice President Network
Operations

Declaration Under Penalty Of Perjury

I, Mike Jaksich, hereby state the following under penalty of perjury: I am the Vice President Network Operations of Southern Illinois RSA Partnership d/b/a First Cellular of Southern Illinois. I have read the foregoing "E-911 Interim Report," and all statements of fact set forth therein are true and correct to the best of my knowledge, information and belief, and are made in good faith. Executed this ✓ 18th day of August, 2003.

✓ [Signature]
Mike Jaksich

Refer All Inquiries And Correspondence To:

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